

RANDALL L.K.M. ROSENBERG #4847-0  
CHARLES E. McKAY #3512-0  
MOANA A. YOST #7738-0

ROSENBERG & McKAY  
733 Bishop Street  
2070 Makai Tower, Pacific Guardian Center  
Honolulu, HI 96813  
Telephone No.: (808) 536-4270  
Facsimile No.: (808) 533-0434  
E-Mail: [grmlaw@hawaii.rr.com](mailto:grmlaw@hawaii.rr.com)

Attorneys for Defendants  
David J. Lujan, Anna B. Lujan and  
INOKO LLC

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

STACY MONIZ	)	CIVIL NO.: 14 CV 00465 DKW-RLP
	)	
Plaintiff,	)	
	)	DEFENDANTS DAVID J. LUJAN,
vs.	)	ANNA B. LUJAN AND INOKO LLC'S
	)	INITIAL DISCLOSURES;
DAVID J. LUJAN; ANNA B.	)	CERTIFICATE OF DISCLOSURE;
LUJAN; INOKO LLC, a Hawaii	)	CERTIFICATE OF SERVICE
limited liability company and DOE	)	
DEFENDANTS 1-20,	)	
	)	
Defendants.	)	
_____	)	

DEFENDANTS DAVID J. LUJAN, ANNA B. LUJAN AND  
INOKO LLC'S INITIAL DISCLOSURES

Come now Defendants David J. Lujan, Anna B. Lujan, and Inoko LLC, by  
and through their attorneys, Rosenberg & McKay, and pursuant to Rule 26(a)(1) of  
the Federal Rules of Civil Procedure, hereby submit their Initial Disclosures.

I. KNOWN WITNESSES

1. David J. Lujan, c/o Rosenberg & McKay, 733 Bishop Street, Suite 2070 Makai Tower, Pacific Guardian Center, Honolulu, Hawaii 96813;
2. Anna B. Lujan, c/o Rosenberg & McKay, 733 Bishop Street, Suite 2070 Makai Tower, Pacific Guardian Center, Honolulu, Hawaii 96813;
3. Stacy Moniz, 47-563 Hua Place, Kaneohe, Hawaii 96744;
4. Bonny Moniz, 47-563 Hua Place, Kaneohe, Hawaii 96744;
5. Barry Isreal; 12 6 Khoi Ngia Bac Son, Villa A-1 Ward 10, Dalat City, Lam Dong Province VN.
6. Doron Weinberg, 523 Octavia Street, San Francisco, CA 94102.

Defendants reserve the right to amend and/or supplement this list throughout the course of litigation and discovery. Defendants reserve the right to call any witnesses listed by Plaintiff, to call custodians of records as necessary, and to call witnesses in rebuttal.

II. EXHIBITS

- a. Correspondence from and to Plaintiff;
- b. Plaintiff's Invoices;
- c. Receipts/payments to Plaintiff.

Discovery is ongoing. Defendants reserve the right to amend and/or supplement this list throughout the course of discovery, to introduce exhibits listed

by Plaintiff, and to introduce exhibits for impeachment and rebuttal.

DATED: Honolulu, Hawaii, January 2, 2015.

/s/ Randall L.K.M. Rosenberg  
RANDALL L.K.M. ROSENBERG

Attorneys for Defendants  
David J. Lujan, Anna B. Lujan and  
INOKO LLC

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

STACY MONIZ	)	CIVIL NO.: 14 CV 00465 DKW-RLP
	)	
Plaintiff,	)	
	)	CERTIFICATE OF DISCLOSURE
vs.	)	
	)	
DAVID J. LUJAN; ANNA B.	)	
LUJAN; INOKO LLC, a Hawaii	)	
limited liability company and DOE	)	
DEFENDANTS 1-20,	)	
	)	
Defendants.	)	
_____	)	

CERTIFICATE OF DISCLOSURE

Pursuant to Rule 26(g) of the Federal Rules of Civil Procedure, I hereby certify that, to the best of my knowledge, information and belief formed after a reasonable inquiry, this disclosure is complete and correct as of the time it is made.

DATED: Honolulu, Hawaii, January 2, 2015.

/s/ Randall L.K.M. Rosenberg  
RANDALL L.K.M. ROSENBERG  
Rosenberg & McKay  
[grmlaw@hawaii.rr.com](mailto:grmlaw@hawaii.rr.com)  
(808) 536-4270

Attorney for Defendants  
David J. Lujan, Anna B. Lujan and  
INOKO LLC

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

STACY MONIZ	)	CIVIL NO.: 14 CV 00465 DKW-RLP
	)	
Plaintiff,	)	
	)	CERTIFICATE OF SERVICE
vs.	)	
	)	
DAVID J. LUJAN; ANNA B.	)	
LUJAN; INOKO LLC, a Hawaii	)	
limited liability company and DOE	)	
DEFENDANTS 1-20,	)	
	)	
Defendants.	)	
_____	)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing upon filing shall be duly served on the following individual(s) on January 2, 2015 via U.S. Mail at his last known address listed below:

Stacy Moniz  
47-563 Hua Place  
Kaneohe, Hawaii 96744

Plaintiff *Pro Se*

DATED: Honolulu, Hawaii, January 2, 2015.

/s/ Randall L.K.M. Rosenberg  
RANDALL L.K.M. ROSENBERG

Attorneys for Defendants  
David J. Lujan, Anna B. Lujan and  
INOKO LLC